

LOUISIANA APPLICATION FOR APPROVAL OF EMISSIONS OF AIR POLLUTANTS

Instructions

Introduction

The Louisiana Application for Approval of Emissions of Air Pollutants provides information to the Permits Section of the Air Quality Division. This information is used to assess air pollution from a proposed facility or modification and the measures that will be used to control air pollution and to meet applicable laws and regulations. Authority to ask for this information is contained in the Louisiana Administrative Code, Title 33. Copies of this law are available from the Regulation Development Section of the Office of Legal Affairs and Enforcement.

Scope

The Application for Approval of Emissions form is intended to apply to a single geographical location of a plant or facility. Treat facilities in geographically dispersed locations separately for the purpose of determining when to submit an application. Submit a separate application for each facility whenever an application is called for at the respective facility. The 1995 Louisiana Air Permit Procedures Manual is a useful guide in completing the forms.

When to submit an Application for Approval of Emissions

Applications are submitted primarily for one of three reasons: (1) to obtain a permit for a new facility or a modification of an existing facility, (2) to reconcile actual emissions to previously permitted emission levels when they are found to differ, or (3) to obtain a permit for an existing facility that is without a permit but is now being made subject to regulations.. This latter condition may exist because (a) the facility was in existence prior to June 19, 1969, a condition known as "grandfathered", (b) the facility was previously specifically exempted because of its small size, or (c) the facility, because of its small size, was never considered by the Air Quality Division for either a permit or an exemption.

To avoid unnecessary delays, applications should be submitted as far in advance as possible of construction of the facility or modification. Some construction projects require prior approval of other DEQ Divisions. Exact review times vary with the complexity of the application and the current workload of the Permits Section. We advise you consult with the Permits Section on a case-by-case basis. Be aware that either the permit or approval

must be obtained before construction commences.

Note: All major sources of air pollutants are required to obtain an operating permit by Title 40, Part 70, of the Code of Federal Regulations. There are no "grandfathered" major sources. Consult LAC 33:III.Chapter 5 for more information on permitting requirements.

What You Should Submit and What You Should Keep

Keep the original of this form for your records. Return three photocopies to this agency. For Part 70 applications, a copy should be submitted directly to EPA's Dallas office-- EPA Region 6 (6T-AN), 1445 Ross Avenue, Ste. 1200, Dallas TX 75202-2733.

Emission Inventory Questionnaire (EIQ) Required

A completed EIQ that reflects projected emissions from the entire facility after the proposed project becomes operational must be submitted with the application. If you are submitting an application for a modification or expansion of an existing facility, the Department of Environmental Quality must also have an EIQ for existing emissions. If you have already submitted an EIQ that is on file with the Department, it may fulfill this requirement. Consult the Permits Section for assistance.

Basis for Reported Emissions

All emission estimates must be supported by calculation or other bases (test results, similar facilities, etc). Emission calculations and any other supporting information that forms the basis for the estimate must be submitted with the application. Fugitive emission estimates should be treated in similar fashion. Calculations should include information necessary to determine and regulate emissions (any capacity/rate restrictions).

Acceptable Answers

If certain questions are not applicable, indicate "none" or "not applicable" (N.A.). Terms such as "not significant", "nil", "trace", etc. may not be appropriate. Please attach additional sheets if more space is needed.

Demonstration of Compliance Required

All new or modified emission points must show compliance with all applicable Louisiana Department of Environmental Quality and federal emission regulations (NSPS, PSD, and NESHAP). A statement of the compliance status for the entire facility, commitment to timely compliance with new requirements, and a schedule for compliance certifications is required.

Professional Engineer Required

A Registered Professional Engineer must certify the application.

General

Do not write information in the top or left side of margin of this form as file folder bindings may cover the information.

1. Company Name, Parent Company, Plant Name and Location

Type or print the name of the company, the name of its parent, the name of the plant, if any, the parish where the plant is located, and the closest town in the same parish as the facility.

2. Proposed Action

Describe the proposed action. Use attachments if necessary. Include information on any alternate operating scenarios affecting emissions and/or products. Include work practice standards or limitations specific to the proposed modification which restrict emissions.

3. Ownership and Use of Adjoining Property

Describe the ownership and use of surrounding property. A map usually contributes to understanding and we recommend that you include a sketch or marked map to answer this question. Enter in the space provided the shortest radial distance in kilometers from the facility to Texas, Arkansas, Mississippi, and Alabama.

4. Type of Application

Check the appropriate box to indicate the type of application. See the section "When to Submit an Application for Approval of Emissions" in these instructions. Indicate the basis for a permit fee calculation in the space provided (LAC 33:III.Chapter 2).

5. Key Dates

Enter your estimates of the dates construction and operation will commence for a new facility or modification.

6. Emissions by Pollutant

List all pollutant emissions from all sources. Like compounds must be listed together on the form. List

criteria pollutants first. Include the total for each compound. Use additional copies of the page if necessary.

7. History of Permitted Emissions

List the permitted emissions of the facility chronologically for each compound emitted. Facilities covered by the grandfather clause should list emissions as of June 19, 1969 as the first entry in the table. Like compounds must be listed together on the form. List criteria pollutants first. Reference any exemptions affecting emissions granted since the last permit action. Include as the last entry the total emissions following the proposed change. Use additional copies of the page if necessary.

8. Emission Sources

Provide a list of emission source ID numbers and their descriptive names as they appear on the single point source EIQ sheets.

9. Applicable Regulations, Air Pollution Control Measures, Monitoring, and Record Keeping

On an emission point ID basis (or other identifier), list applicable state and federal regulations and pollution abatement programs, and describe how compliance with these programs will be achieved. Clearly identify federal requirements from state requirements for each point ID. Where state requirements duplicate the federal requirements, list only the federal. In the matrix format, emission points form the left, y-axis (or 1st column), and applicable regulation form the top, x-axis(or 1st row).

On an emission point ID basis (or other identifier): list the proposed air pollutant control measures that will be employed to limit emissions, (e.g., bag filter, scrubbers, low NO_x, burners, steam injection); list any record keeping, monitoring device, or activities proposed for emission control to ensure compliance with permitted rates; specify which test methods are proposed to demonstrate performance of the control equipment; specify which test methods, other than those detailed above, are proposed to demonstrate compliance with emission limitations; and include explanations of any exemption from any otherwise applicable regulation. Use attachments as necessary.

For sources subject to federal Title IV (acid rain) requirements, complete and submit the federal forms.

10. Compliance with Federal Requirements

For sources currently in compliance: State briefly the compliance status of the facility. Indicate a commitment to continued compliance with currently applicable requirements and to future compliance on a timely basis

with requirements which become applicable during the permit term.

For sources not currently in compliance: Give a description of how compliance will be achieved, including a schedule for compliance. Indicate remedial measures and milestones leading to compliance with any applicable requirements; include a schedule for submitting certified progress reports, to be submitted no less than every 6 months.

For all sources: Provide a schedule for submission of compliance certifications during the permit term. Include a brief description of methods used for determining compliance (monitoring, record keeping, reporting, etc.). Include a statement indicating the source's compliance status with any enhanced monitoring and compliance certification requirements of the Act. A responsible company official (as defined in 40 CFR 70.2) shall certify the truth, accuracy, and completeness of these statements.

11. Personnel

-Responsible official

Enter the name, address, and phone number of the responsible company official.

-Professional Engineer

A Professional Engineer must certify the application. The engineer's name, firm, address, and phone number should be entered.

-Certification

An authorized company agent should sign and date the form confirming its accuracy and completeness. A professional engineer should sign and date the form confirming accuracy of calculations, drawings, and designs.

A. "IT" QUESTIONS

1. Have the potential and real adverse environmental effects of the proposed facility (activity) been avoided to the maximum extent possible?
2. Does a cost benefit analysis of the environmental impact costs balanced against the social and economic benefits of the proposed facility (activity) demonstrate that the latter outweighs the former?
3. Are there alternative projects which would offer more protection to the environment than the proposed facility (activity) site without unduly curtailing nonenvironmental benefits?

4. Are there alternative sites which would offer more protection to the environment than the proposed facility (activity) site without curtailing nonenvironmental benefits?

5. Are there mitigating measures which would offer more protection to the environment than the facility (activity) as proposed without unduly curtailing nonenvironmental benefits?

B. Title VI Stratospheric Ozone

1. Does your facility have any air conditioners or refrigeration equipment that uses CFCs, HCFCs or other ozone-depleting substances?

yes no

2. Does the air conditioner or refrigeration equipment contain a refrigeration charge greater than 50 pounds?

yes no

3. Do your facility personnel maintain, service, repair, or dispose of any motor vehicle air conditioners (MVACs) or appliances ("appliance" and "MVAC" as defined at 40 CFR 82.152)?

yes no

4. Cite and describe which title VI requirements are applicable to your facility (i.e. 40 CFR Part 82, Subpart A through G.) in the Regulatory Applicability section of the application.

yes no

C. Title IV Acid Rain

Complete the Acid Rain Program Phase II forms for affected facilities (available from the EPA bulletin board system).